



MEMORANDUM

Date: January 23, 1990
To: Distribution List
From: Paul E. Takacs *PT*
Subject: L1630200005 -- St. Clair County
Sauget Sites (Area I) -- Sauget
Superfund -- Compliance/Enforcement **CONFIDENTIAL**

Representatives from IEPA and the Attorney General's Office met with Cerro Copper officials in Sauget on January 16, 1990. Our discussions focused on the presentation of data from work performed by Cerro's consultants, the Avendt Group and Patterson Schafer. Ray Avendt gave a presentation on the character of waste material found in Creek Segment A (CS-A) and provided a status report of their investigations.

This status report consisting primarily of a site description and chemical characterization was written with the expressed intention that IEPA would provide all guidance in the preparation of a final report on CS-A. This final report will be prepared consistent with guidances on Engineering Cost Analyses and will incorporate some elements of a remedial investigation. The outline of this final report will be presented to Cerro by February 15, 1990. Volume determinations of contaminated sediment in CS-A were calculated from a series of borings and from the chemical analysis. This in-situ volume was estimated at 19,348 cubic yards with a dry volume estimated at 12,000 to 13,000 cubic yards.

As stated in previous meetings, the sediment is widely believed to contain high levels of PCBs/PCB precursors which have been directly traced to an outfall used by Monsanto prior to the construction of the first treatment plant. Cerro appeared to be confident that their investigations are conclusive about the origin of the contamination.

The remedial alternatives that were discussed included incineration and off-site disposal. Because of potentially high concentrations of leachable metals from incinerator ash, incineration appears to have been ruled out. Off-site disposal at a licensed RCRA facility (USPCI, Utah) was discussed as a more probable alternative, but it raises several important questions, namely a land ban on remediated waste becoming effective November 8, 1990. Cerro's attorney, Michael Rodburg was insistent on State approval of both Cerro's site investigation and ultimate destination of the waste material well before this deadline. A completion date for final removal was projected at December 31, 1990.



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In regards to approval on any remedial action, it would be most appropriate to handle this in a consent decree separate from a potential consent decree for all Area I sites. All provisions from the final report produced by the Avenet Group would be subject to IEPA and IAGO approval.

Regarding the cleanup levels, Rodburg indicated that the remedial action would be limited to a source removal, the source being defined as "characteristic still bottom sediment". The Avenet group is currently performing studies to determine the boundary between contaminated sediment and stained soil. The results of these studies which could change initial volume determinations will be included in the final report before a consent decree is signed.

In reference to the dewatering project necessary for construction of the stormwater retention basin, pumping wells are currently discharging into CS-A with the overflow going to a storm sewer inlet tributary to the American Bottoms Treatment Plant. This process will continue pending construction of the retention basin, scheduled to be completed by May 9, 1990 at the cost of \$2.34 million. Upon completion, contaminated stormwater from the creek would be discharged into the basin. Creek sediments would be removed and dewatered prior to final disposal. A possible area of concern could be dewatering products (leachate) which would presumably be discharged to American Bottoms. In the case of this discharge, a supplemental permit from the Division of Water Pollution Control could be required.

A meeting at the Attorney General's Office has been scheduled for January 26 to discuss these and other matters concerning the Sauget Sites.

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1/16/89

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